

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

WASHINGTON SHERATON CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:05CV0971(HHK)
	)	
2660 WOODLEY ROAD JOINT VENTURE,	)	
	)	
and	)	
	)	
JOHN HANCOCK LIFE INSURANCE COMPANY	)	
(Formerly known as John Hancock Mutual Life	)	
Insurance Company),	)	
	)	
Defendants.	)	
	)	

CONSENT MOTION TO EXTEND FILING DEADLINES

COMES NOW, the Plaintiff, the Washington, Sheraton Corporation, by and through counsel, by consent of all counsel, pursuant to F.R.Civ.Pro. 6(b) and L.Cv.R. 7, to respectfully request the entry of an order extending the time within which the Plaintiff is required to file its opposition, or otherwise respond to, the Defendants' motion to dismiss or in the alternative for summary judgment through August 23, 2005, and to extend the time for the Defendants to file their Reply through September 9, 2005. In all other respects the existing scheduling order shall remain unchanged.

Wherefore, the parties pray:

1. That the instant motion be granted; and
2. That the Court grant such other and further relief as is just and proper.

Respectfully submitted,

BICKEL & BREWER

By _____
William A. Brewer, III
James S. Renard
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(Not admitted in the District of Columbia)

SCHEUERMANN & MENIST

By: _____
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Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing consent motion was this ____ day of August, 2005, mailed, first class mail, U.S. Postage pre-paid to: William E. Wallace, III, Esquire and Stefan Shaibani, Esquire, MILBANK, TWEED, HADLEY & McCLOY, LLP, 1825 Eye Street, N.W., Suite 1100, Washington, D.C. 20006, Counsel for the Defendants.

John E. Scheuermann

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
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WASHINGTON SHERATON CORPORATION,

Plaintiff,

V.

2660 WOODLEY ROAD JOINT VENTURE,

and

JOHN HANCOCK LIFE INSURANCE COMPANY
(Formerly known as John Hancock Mutual Life
Insurance Company),

Defendants.

) Case No. 1:05CV0971(HHK)

ORDER

Upon consideration of the parties consent motion to extend time, it is by the Court this

____ day of August, 2005

ORDERED

That the motion is, and is hereby, granted; and

The Plaintiff shall oppose, or otherwise respond, to the Defendants motion to dismiss, or in the alternative, for summary judgment on or before August 23, 2005; and

The Defendants shall Reply on or before September 9, 2005; and

In all other respects the scheduling order is unchanged.

UNITED STATES DISTRICT JUDGE

Copies to:

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